



INTEROFFICE CORRESPONDENCE

DATE July 14 1993
TO: S D Cooke Legal Department Building 111 X3497
FROM: J R FitzSimmons Waste Technical Support Bldg 130C X6264 *JRF*
SUBJECT: TASK PLAN NO 4 (RCRA/CERCLA INTEGRATION) SUBTASK NO 6
JRF 031 93

Waste Technical Support has reviewed the selected OU 2 documents for unaddressed waste issues and has developed the following comments

All of the RCRA regulatory compliance guidelines are found in the Environmental Management Document (EMD) Operating Procedures. The RCRA facility investigation/remedial investigation (RFI/RI) Work Plan refers back to the EMD Operating Procedure when cases such as the handling of investigation derived waste (drill cuttings) monitoring well purge waste occur in the work plan. Waste Technical Support's opinion is that the regulatory review should be aimed more toward the EMD Operating Procedures to find potentially unaddressed waste issues in the situation of OU 2. This is not to say that other OU Work Plans will not contain items that will raise regulatory issues.

The RFI/RI phase addresses Application of Relevant and Appropriate Requirements (ARARs) to a limited extent. The full development in future phases should include open dumping criteria, groundwater protection and monitoring, closure and post-closure care requirements for containers, tank, surface impoundments, land treatment facilities, waste piles and landfills, and land disposal restrictions. Review of ARARs and waste management as the OU's progress through Feasibility Studies and Remedial Design/Remedial Action phases will be essential due to the larger variety of wastes and the methods in which they are managed.

During review of OU 2's Work Plan, there were a large number of wells and bore holes observed. The large number of holes in OU 2 along with all the drill activities in other OUs, both in past and present, have and are producing a huge number of drums. Interim Status storage units 18 03 and 18 04 were setup to handle a certain number of drums. The capacities of the storage units may require modification to accommodate the present and future drums generated from ER activities.

If you have any questions, please call me at X6264.

bej

cc

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ADMIN RECCRD



SW-A-004328